

# Exhibit 18a

**From:** [David Bouchard](#)  
**To:** [Richens, Dana](#)  
**Subject:** JG v. United Inn & Suites  
**Date:** Thursday, June 1, 2023 9:08:00 AM

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Good morning, Dana—

I'm writing to memorialize a few items from our call yesterday on the JG matter. In accordance with Judge Geraghty's direction during the telephonic conference, we conferred about whether there is a possible way for the parties to resolve Defendant's discovery noncompliance and misconduct without Plaintiff filing a motion for sanctions. We discussed the sanctions Plaintiff believes she is entitled to under the rules and the case law. I understand you need some time to consider the sanctions Plaintiff would request via a motion for sanctions so that you and your client can discuss whether to agree to some or all of what Plaintiff intends to request (obviating the need for a sanctions motion), or to make a different proposal altogether. Either way, I'm agreeable to giving you until next Friday, June 9<sup>th</sup> to get back to me with an answer on your client's position. If I don't hear back, I will move forward with filing the motion for sanctions the week of June 12<sup>th</sup>. If your answer on June 9<sup>th</sup> is that your client has a serious proposal to make, then I'd like to talk by phone early the week of June 12<sup>th</sup> about that proposal so we can decide whether it may be sufficient to resolve the dispute.

Thanks, Dana.

Best regards,

David

**David Bouchard** ([Bio](#))

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